

**Remarks for the Section 106 meeting on 8 May 2008 related to the DEIS  
May 6, 2008**

**My name is Roger W. Brucker.** I am a Consulting Party for the Section 106 process related to the DEIS for the \$55 million I-65 interchange and Kentucky Transpark access road.

DRAFT responses were furnished to me by an unidentified-by-number document, and a few of these responses were specific to comments I had made earlier.

On **Page 10** my comment about inadequate archaeological investigation is dismissed by the statement that the SHPO signed off and that protocol was followed. The substance of my comments was **NOT ADDRESSED**: Adequate cave vestibule and sinkhole archaeology has **NOT** been applied **AND IS NOT COVERED UNDER THE CITED PROTOCOL**. A promise of a future agreement to adhere to the same **INADEQUATE** protocol is unresponsive, dismissive, and deceptive. Official secrecy about archaeology investigations makes it impossible for consulting parties to consult. *"Tell 'em nothing and claim compliance."*

On **Page 11** my comments about circumvention of the 106 process and impermissible segmentation of the project were categorically denied. The Response uses rhetoric and substance to assert that no circumvention has taken place and that no segmentation has taken place. This "proof by assertion" Response further confirms my observation that this protracted, multi-year process has been designed to thwart public interest, participation, and comment on the project, thus circumventing the letter and intent of the NEPA and 106 process. Assertions that the delay broke no procedural rules is a bureaucratic answer to an **obvious circumvention**. *"Wear 'em out and they won't come back."*

As to the segmentation claim that I made, the Response deliberately threads a needle of deception by claiming that the project in and of itself is self-contained. The use of circular reasoning – the project is described from the beginning as NOT a segmentation of the KY Transpark overall project -- is self-serving and deceptive. **Can ANYONE deny that this project would never have been conceived had it NOT been a part of the KY**

**Transpark?** Claiming that this interchange project is not a segment of the Transpark is false, attested to by the fact that earlier descriptions of the KY Transpark **PROMOTE** the interchange as **AN INTEGRAL PART** of the project that has been segmented for the purpose of gaining federal funds and gaming the system. *"The water tank advertising lettering is designed to be read from the new road and proclaim 'Main Entrance!'"*

I request that my remarks above be made a part of the official record of the 8 May meeting, and that I continue to receive any and all information about this project. Thank you.

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